Bay Delta Conservation Plan
Document Review Comment Form

Please use this form to document your comments to the above document. Please number your comments in the first column and indicate the page, section, and line number (if provided) that reference the comment's location in the review document.

To be of the greatest value to the document development process, please make your comments as specific as possible (e.g., rather than stating that more current information is available regarding a topic, provide the additional information [or indicate where it may be acquired]; rather than indicating that you disagree with a statement, indicate why you disagree with the statement and recommend alternative text for the statement). Do not enter information in the Resolution column. **Return completed document form to xxxxx by COB MM/DD/YYYY.**

Document: Effects Analysis Appendix A. Conceptual Foundation and Analytical Framework					**Date Comments Requested by:**
Comments Submitted By: L Grober		**Affiliation: State Water Board**			**Date Comments Submitted:**
NO.	**SECTION #**	**PAGE #**	**LINE #**	**COMMENT**	**RESOLUTION**
		a-5 to a-7		The importance of flow to the conceptual foundation of ecological health of the Delta is not provided. There are only two mentions of flow in the Ecological Principles section, A.1.3: 1) outflow as it is related to salinity gradients (in item 8-- Changes in water quality have important direct and indirect effects throughout the estuarine ecosystem); and 2) land use (item 9-- 9: Land use is a key determinant of the spatial distribution and temporal dynamics of flow and contaminants which, in turn, can affect habitat quality) Flow is incidental in both; Other Assessments of factors affecting ecological health prpeapred by others (Delta Science, Delta Plan, Department of Fish and Game, State Water Baord) have a greater focus on the effects of flow. Flow issues are mentioned on page a-42, but only in the context of flow-salinity.	A principle should be added that speaks to flow; See, for example, Problem Statement on page 112 of Delta Plan: "Native aquatic species in the Delta are adapted to flow regimes characteristic of California's natural climate and hydrology. This includes higher flows in the winter and spring and lower flows in the summer and early fall. Altered Delta flow regimes are detrimental to native aquatic species and encourage nonnative aquatic species";

			a-5 to a-7			See also pages 6 and 7 from Conservation Strategy for Restoration of the Sacramento-San Joaquin Delta Ecological Management Zone and the Sacramento and San Joaquin Valley Regions, July Draft: "Inflow from the San Joaquin and Sacramento Rivers and outflow from the Delta should reflect the natural flow patterns (hydrograph) and be sufficient to cue and facilitate upstream and downstream migrations of fishes through the Delta and stimulate other biotic and abiotic processes. Flows should also support local movements of fishes and provide access to and movement among currently functioning and restored aquatic habitats. Restored flows and habitats aim to improve physical conditions and food production for imperiled fish species, and along with reductions in major stressors, should support thriving populations of fish and other species in the Delta."
			a-5 to a-7			See also page 5 of Strate Water Board's Delta Flow Report: "Recent Delta flows are insufficient to support native Delta fishes for today's habitats. Flow modification is one of the immediate actions available although the links between flows and fish response are often indirect and are not fully resolved. Flow and physical habitat interact in many ways, but they are not interchangeable."
			a-5 to a-7			See also package of material prepared by Delta Science Program for January 26, 2011 Delta Stewardship Council meeting

			a-5 to a-7, a-45		The only mention of water quality in ecological principles is item 8:"Changes in water quality have important direct and indirect effects throughout the estuarine ecosystem." This item then refers to the Glibert (2010) paper thas has been challenged (see comment below), and specifically calls out only salinity and turbidity. The document does not seem to focus sufficeintly on the water quality effects of removing large quantities of fresh water upstream of the Delta, relative to the current condition. In the only Water Quality section (page a-45), water quality is bundled with (and subordinated to) turbidity. It is asserted on page a-45 that..."BDCP conservation measures will have limited direct effect on water quality..." This suggest that changes in flow patterns, dlution flows, mobilization of contaminants in restored habitat areas associated with BDCP, etc. will have no limited quality effects.	Suggest modifying words in item 8 on page a-6 to more broadly describe water quality; and follow through with expanded discussion throughout document, including how BDCP changes could affect water quality.
			a-8		One of the bullet point identified to achieve ecological health of the delta is: " Actions that directly address key ecosystem drivers rather than manipulation of Delta flow patterns alone." Use of "rather than" appears conclusory, suggesting that flow is not important. Such a conclusion is premature for a framework that is meant to provide foundation for an effects analysis.	A more flat way of presenting this point would be to say: "Actions that address key ecosystem drivers in conjunction with manipulation of Delta flow patterns" . Suggest the document follow through and provide information consistent with this more flat statement.
		multiple locations including page A-45			Glibert's (2010) paper concerning long-term changes in nutrient loading and stoichiometry and their relationships with changes in the food web and dominant pelagic fish species in the San Francisco Estuary, California is referenced at multiple points within the document (e.g., page A-45). The conclusions in this paper have been challenged by Cloern et al. (2011), who demonstrate that the statistical methods used to derive the food web relationships are inappropriate and generate false correlations.	The 5th Draft of the Delta Plan (page 142) provides an example for how areas of active research and scientific debate, such as this, can be put in context and more fully described.

Bay Delta Conservation Plan
Document Review Comment Form

Bay Delta Conservation Plan
Document Review Comment Form

Bay Delta Conservation Plan
Document Review Comment Form

Please use this form to document your comments to the above document. Please number your comments in the first column and indicate the page, section, and line number (if provided) that reference the comment's location in the review document.

To be of the greatest value to the document development process, please make your comments as specific as possible (e.g., rather than stating that more current information is available regarding a topic, provide the additional information [or indicate where it may be acquired]; rather than indicating that you disagree with a statement, indicate why you disagree with the statement and recommend alternative text for the statement). Do not enter information in the Resolution column. **Return completed document form to xxxxx by COB MM/DD/YYYY.**

Document: Effects Analysis Appendix A. Conceptual Foundation and Analytical Framework	
Comments Submitted By: L Grober	**Affiliation: State Water Board**

NO.	

Bay Delta Conservation Plan
Document Review Comment Form

Bay Delta Conservation Plan
Document Review Comment Form

Bay Delta Conservation Plan
Document Review Comment Form

Bay Delta Conservation Plan
Document Review Comment Form